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7 Honorable Benjamin H. Settle  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

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NORTHWEST SCHOOL OF SAFETY, a Washington sole proprietorship, PUGET SOUND SECURITY, INC., a Washington corporation, PACIFICA NORTHWEST ASSOCIATION OF INVESTIGATORS, INC., a Washington corporation, FIREARMS ACADEMY OF SEATTLE, INC., a Washington corporation, DARRYL LEE, XEE DEL REAL, JOE WALDRON, GENE HOFFMAN, ANDREW GOTTLIEB, ALAN GOTTLIEB, GOTTLIEB FAMILY REVOCABLE LIVING TRUST, a Washington trust, and SECOND AMENDMENT FOUNDATION, a non-profit organization,

Plaintiffs,

v.

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BOB FERGUSON, Attorney General of Washington (in his official capacity), WASHINGTON ATTORNEY GENERAL'S OFFICE, and JOHN R. BATISTE, Chief of the Washington State Patrol (in his official capacity), and DOES I-V,

Defendants.

No. 3:14-cv-6026 BHS

DECLARATION OF TARA PAONE IN SUPPORT OF CHERYL STUMBO, WASHINGTON ALLIANCE FOR GUN RESPONSIBILITY, AND EVERYTOWN FOR GUN SAFETY ACTION FUND FOR I-594'S MOTION TO INTERVENE AS DEFENDANTS

DECLARATION OF TARA PAONE IN SUPPORT OF STUMBO, WAGR, AND EVERYTOWN'S MOTION TO INTERVENE - 1

Case No. 3:14-cv-6026 BHS

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PACIFICA LAW GROUP LLP  
1191 SECOND AVENUE  
SUITE 2000  
SEATTLE, WASHINGTON 98101-3404  
TELEPHONE: (206) 245 1700  
FACSIMILE: (206) 245 17500

1 I, Tara Paone, declare as follows:

2 1. I am over the age of 18, am competent to testify, and offer this declaration based  
3 on my personal knowledge.

4 2. I am the President of Everytown for Gun Safety Action Fund for I-594  
5 ("Everytown for I-594"). Everytown for I-594 is a Washington State ballot committee registered  
6 with the Washington State Public Disclosure Commission and established to support passage of  
7 Initiative 594.

8 3. Everytown for I-594 was formed in July 2014 by Everytown for Gun Safety  
9 Action Fund, the nation's largest gun violence prevention organization, which fights for public  
10 safety measures that both respect the Second Amendment and improve public safety.

11 4. Everytown for I-594 was formed in order to provide 45,000 grassroots supporters  
12 and 27 mayors in Washington State an avenue to help pass I-594 and save lives by requiring all  
13 Washingtonians to undergo the same background check when buying a gun.

14 5. Everytown for I-594 worked closely with WAGR and Ms. Stumbo in  
15 spearheading the campaign to pass I-594, collecting funds and in-kind donations to support the  
16 campaign, enlist grassroots support, and mobilize voters. Everytown for I-594 engaged  
17 Washington residents by knocking on doors and making thousands of phone calls; in the final  
18 three weeks of the campaign alone, the committee supported more than 300 volunteer shifts, and  
19 generated more than 15,000 total canvassing attempts, including phone calls and door knocks.

20 I declare under penalty of perjury of the laws of the State of Washington that the  
21 foregoing is true and correct.

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DECLARATION OF TARA PAONE IN SUPPORT OF  
STUMBO, WAGR, AND EVERYTOWN'S MOTION TO  
INTERVENE - 2  
Case No. 3:14-cv-6026 BHS

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SUITE 2000  
SEATTLE, WASHINGTON 98101-3404  
TELEPHONE: (206) 245.1700  
FACSIMILE: (206) 245.17500

1 DATED this 20 day of February, 2015, signed in New York, New York



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Tara Paone

DECLARATION OF TARA PAONE IN SUPPORT OF  
STUMBO, WAGR, AND EVERYTOWN'S MOTION TO  
INTERVENE - 3

Case No. 3:14-cv-6026 BHS

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1191 SECOND AVENUE  
SUITE 2000  
SEATTLE, WASHINGTON 98101-3404  
TELEPHONE: (206) 245.1700  
FACSIMILE: (206) 245.17500

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of February, 2015, I electronically filed the foregoing document with the United States District Court ECF system, which will send notification of such filing to the following:

David B. Edwards  
Steven W. Fogg  
Corr Cronin Michelson Baumgardner & Preece  
1001 4th Avenue  
Suite 3900  
Seattle, WA 98154-1051  
Phone: 206.625.8600  
Email: [dedwards@corrchronin.com](mailto:dedwards@corrchronin.com)  
Email: [sfogg@corrchronin.com](mailto:sfogg@corrchronin.com)

Mikolaj T. Tempski  
Tempski Law Firm PS  
40 Lake Bellevue  
Suite 100  
Bellevue, WA 98005  
Phone: 425.998.6203  
Email: [Miko@TempskiLaw.com](mailto:Miko@TempskiLaw.com)

*Attorneys for Plaintiffs*

*Attorneys for Plaintiffs*

Jeffrey T. Evan  
Noah Purcell  
R. July Simpson  
Rebecca Ripoli Glasgow  
Solicitor General  
Washington State Attorney General's Office  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
Phone: 360-753-6200  
Email: [noahp@atg.wa.gov](mailto:noahp@atg.wa.gov)  
Email: [jeffe@atg.wa.gov](mailto:jeffe@atg.wa.gov)  
Email: [RJulyS@atg.wa.gov](mailto:RJulyS@atg.wa.gov)  
Email: [RebeccaG@atg.wa.gov](mailto:RebeccaG@atg.wa.gov)

*Attorneys for Defendants*

Signed at Seattle, Washington this 23rd day of February, 2015.

Dawn M. Taylor

**DECLARATION OF TARA PAONE IN SUPPORT OF  
STUMBO, WAGR, AND EVERYTOWN'S MOTION TO  
INTERVENE - 4**

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FACSIMILE: (206) 245.17500